

**EXHIBIT B**

EXHIBIT B

COMMONWEALTH OF PUERTO RICO  
**TREASURY DEPARTMENT**  
San Juan, Puerto Rico

Name

Address

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Notice Date:

Account Number:

**RE: REIMBURSEMENT FOR DOUBLE PAYMENT OF COMPULSORY INSURANCE  
PREMIUMS PERIOD 1998-2010**

Valued taxpayer:

In accordance to the Order issued in Gladys García Rubiera, et al v. Juan Flores Galarza, et al., Civil No. 02-1179(GAS), the Treasury Department notifies you that you are entitled to claim a reimbursement for the double payment of compulsory insurance premiums that you made at some point between 1998 and 2010. Taxpayers who are motor vehicle owners that made any double payment for the compulsory insurance premiums from 1998 to 2010 and have not requested the reimbursement for said payment will be able to claim it pursuant to the enclosed procedure.

According to our records, you are entitled to claim a reimbursement for the motor vehicles listed on the overleaf.

[See detail on back. (INCLUDE INFORMATION FROM LISTS)].

The reimbursement application can be sent online to the following e-mail address \_\_\_\_\_, or by mail to \_\_\_\_\_, on or before the expiration of the two-year period, counted from the last publication of this notice in a newspaper.

This notice is issued in compliance and as a result of the stipulation and judgement issued in the García Rubiera, et al., v. Hon. Luis G. Fortuño, et al, Civil Number 02-1179 (GAG) before the United States District Court for the District of Puerto Rico, and the stipulation in the Gladys García Rubiera, et al v. Asociación de Suscripción Conjunta del Seguro de Responsabilidad Obligatorio, Civil Number KDP2001-1441 (801) case in the San Juan Part of the First Instance Court.

For any questions call (787) \_\_\_\_ - \_\_\_\_

Cordially,

Edgardo Betancourt  
Assistant Secretary  
Public Insurances Area  
Treasury Department

Additional Information:

The Secretary of the Treasury Department will have 120 days from submission to verify that the information contained in your application is correct, that the applicant appears on the lists provided by the ASC, and that you do not owe taxes to the Government of Puerto Rico. After said verification, the Secretary will proceed to approve the application and reimburse the owner of the vehicle. If the application is denied, the reasons for the denial will be notified to the applicant by mail.

Every applicant has a period of two years from the last publication of this notice in the newspaper to pursue their claim with the Treasury Department.

The reimbursement of the duplicate premiums will not involve the payment of interest, and a 20% deduction will be withheld from the corresponding reimbursement or credit towards legal fees for:

Antonio J Amadeo Murga, Esq.  
Midtown Bldg.  
420 Ave. Ponce de Leon – Suite 910  
San Juan, PR 00918

Mario M. Oronoz, Esq.  
Urb. Torrimar  
K-4 Calle Bambu  
Guaynabo, PR 00966

Said attorneys will receive an amount equivalent to 20% of all reimbursements and credits that the Treasury Department grants to the claimants, that arise from the applications submitted during the two-year term from the last day on which this notice is published in newspapers, the sum of which will not be less than \$1,375,000.00

**EXHIBIT C**

**COMMONWEALTH OF PUERTO RICO  
FIRST INSTANCE COURT  
SAN JUAN PART**

GLADYS GARCÍA RUBIERA, ET. AL.  Plaintiffs  V.  ASOCIACIÓN DE SUSCRIPCIÓN CONJUNTA DEL SEGURO DE RESPONSABILIDAD OBLIGATORIO, ET. AL,  Defendants	CIVIL NO.: K DP2001-1441 (801)  RE:  CLASS ACTION ACT NO. 118 OF JUNE 25, 1971; TORTS; INTEREST RECOVERY AND REFUND OF PREMIUMS
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**Class Action Notice and Settlement Proposal**

TO ALL PERSONS AND ENTITIES THAT PAID FOR THE COMPULSORY INSURANCE FOR MOTOR VEHICLES THAT TRAVEL ON THE PUBLIC ROADS OF PUERTO RICO DURING THE PERIOD FROM 1998 TO 2010, PURSUANT TO ACT 253 OF 1995, 26 SEC 8051 AND SUBSEQUENT, WHO DURING THOSE YEARS PURCHASED PRIVATE AND/OR TRADITIONAL INSURANCES AND WERE NOT REIMBURSED THE \$99.00 OR \$148.00 OF THE COMPULSORY PREMIUM FOR HAVING OBTAINED PRIVATE INSURANCE, AND ARE ENTITLED TO SAID REIMBURSEMENT.

YOU ARE HEREBY NOTIFIED that, in accordance to Rule 20 of the Puerto Rico Rules of Civil Procedure and Act 118 of June 25, 1971, as amended, (Consumer Class Action Act) an agreement has been reached between class action representatives and the codefendant Commonwealth of Puerto Rico, in regards to the class action initiated by the class against the latter in the First Instance Court, San Juan Part, as well as in Gladys García Rubiera, et al., v. Hon. Luis G. Fortuño, et al, Civil Number 02-1179 (GAG), the settlement of which has the purpose of notifying the members of the class of their right to receive reimbursements for the compulsory insurance premium that was not mandatory for them to pay, due to having obtained private insurance, therefore being entitled to said reimbursement.

The settlement stipulation has the purpose of advising the class, defined as: “All owners of motor vehicles in the Commonwealth of Puerto Rico, whom during 1998 to 2010 paid for the compulsory liability insurance, while having a current private insurance policy, whom have not been reimbursed nor granted a credit for the payment of said compulsory insurance”, the manner and procedure to obtain reimbursement for said duplicate premium is as follows:

1. Thirty (30) days from approval of the notice to the class in this case, as well as in the case before the United States District Court, Gladys García Rubiera, et als., v. Hon. Luis G. Fortuño, et al, Civil Number 02-1179 (GAG), the Secretary of the Treasury Department, will send letters through first class mail to each vehicle owner that appear on the list sent to the Secretary by the

Asociación de Suscripción Conjunta del Seguro de Responsabilidad Obligatorio (ASC) for the years 1998 to 2010, to those persons that have addresses at which said notices can be delivered in accordance with the applicable rules of the United States' postal service, whose addresses will be supplemented or verified with vehicle owner address information held by the Secretary of the Department of Transportation and Public Works.

- a) The letter will notify the motor vehicle owners that they may be entitled to apply for a refund for duplicate premiums for the years stated on the letter.
  - b) The letter will include the information contained on the lists sent by the ASC to the Secretary of the Treasury Department in regards to name, address, the last four digits of the social security number, plate number, VIN number, name of insurance carrier, policy number, and relevant years.
  - c) The letter will also include an application form.
2. In addition to the notice by letter described in section 1, the Secretary of the Treasury Department will publish the full list of vehicle owners that may be entitled to be reimbursed for the years 1998 to 2010, pursuant to the list sent by the ASC to the Secretary, on a webpage that the motor vehicle owners can easily access. Said webpage will be created in a such way that each person who has a reasonable belief that they are entitled to a reimbursement may request the information, including their name and information related to the motor vehicle for which they paid the compulsory insurance and private insurance premiums.
  3. In addition to the webpage, the complete list of all motor vehicle owners who may be entitled to a reimbursement will be available digitally at all Commonwealth collections offices, and their staff will provide applicants the page or pages in which the applicant might appear.
  4. This Settlement Proposal Notice will be published in the El Nuevo Día and El San Juan Star newspapers once a week during six (6) consecutive weeks.
  5. Announcements will also be made twice a day during a four week period, ten times a week, in each of the following radio stations: WKAQ, Radio Isla, and Radio Oro.
  6. All motor vehicle owners who paid duplicate premiums between 1998 and 2010 can submit an application online at the following address: \_\_\_\_\_

Or by mail addressed to the Secretary of the Treasury Department at their address:

\_\_\_\_\_

The application, whether it be online or by mail, will include the applicant's name, address, social security number, the plate number for the vehicle that is entitled to reimbursement, the vehicle's identification number (VIN), policy number for the private insurance carrier, and the years being claimed, as said information arises from the published lists.

7. In the application, you will state under penalty of perjury that, for the applicable year or years, you were the owner of the vehicle, that you paid the compulsory premium and also the private insurance premium that corresponds to that vehicle, that you have not been reimbursed nor have you received a credit for that payment in any way. No additional information or documentation shall be required from you.
8. The Secretary of the Treasury Department will have 120 days to verify that the information provided on the application is correct, that the applicant appears on the lists provided by the ASC, and that they do not owe taxes to the Government of Puerto Rico. After verification, the Secretary will proceed to approve the application and to reimburse the vehicle owner. If the application is denied, the reasons for the denial will be notified to the applicant by mail.

9. Class members will have a period of two years from the last publication in the newspaper to pursue their claim with the Treasury Department, according to the procedure that has been established in this agreement.
10. The reimbursement for duplicate premiums will not include payment of interest.
11. This notice is published in compliance with and as a result of the stipulation and judgment issued in García Rubiera, et al., v. Hon. Luis G. Fortuño, et al., Civil Number 02-1179 (GAG) before the United States District Court for the District of Puerto Rico, and in Gladys García Rubiera, et al v. Asociación de Suscripción Conjunta del Seguro de Responsabilidad Obligatorio, Civil Number KDP2001-1441 (801), in the San Juan Part of the First Instance Court. The names and addresses of the attorneys of the class are:

Antonio J Amadeo Murga  
Midtown Bldg.  
420 Ave. Ponce de Leon – Suite 910  
San Juan, PR 00918

Mario M. Oronoz  
Urb. Torrimar  
K-4 Calle Bambu  
Guaynabo, PR 00966

11. As proposed in this case before the First Instance Court, in compliance with Act 118 of June 25, 1971, (Consumer Class Action Act), class attorneys Antonio J. Amadeo Murga and Mario M. Oronoz will receive an amount equivalent to 20% of all reimbursements and credits that the Treasury Department issues to the class that arise from the applications submitted during the two-year term from the last day in which the notice is published in one of the aforementioned newspapers, the sum of which will not be less than \$1,375,000.00, which will be paid in the following manner:
  - i. \$375,000.00 will be deposited at the Court 90 days from approval of the agreement by way of judgement.
  - ii. \$250,000.00 one year from the first payment.
  - iii. \$250,000.00 two years from the first payment.
  - iv. \$250,000.00 three years from the first payment.
  - v. \$250,000.00 four years from the first payment.

If approved by the Court, the legal fees set to be received by the plaintiff class attorneys, will be distributed at a ratio of 75% for Antonio J. Amadeo Murga, Esq. and 25% for Mario M. Oronoz, Esq.

12. As a result of the proposed agreement, class members:
  - i. Will be notified of their right to reimbursement in the manner stated in this Notice.
  - ii. Will be able to use a claim method that is more flexible than the one currently in effect.
  - iii. Their claim will be resolved within the 120-day term.
  - iv. Will be able to verify their identity and submit their claim online.
  - v. Will have the extended period from 1998 through 2010 to base their claim upon.
13. Through this notice you are hereby advised that you have the right to be excluded from the litigation in the First Instance Court, San Juan Part, by submitting a motion within the next thirty (30) days from the last publication in the newspaper, requesting to be excluded from the class action. The Judgement will include all class members that do not request to be excluded. Even if you do not wish to be excluded from the class, you may appear in Court represented by an attorney of your preference.
14. All members of the Plaintiff class are entitled to object the proposed agreement completely or partially, including the reasonableness of the legal fees. Any member of the class that wishes to object to agreement because they consider it to be completely or partially unreasonable or unfair,

must personally or by way of private counsel file an objection before the First Instance Court or before the Department of Consumer Affairs (DACO). The objection must contain the name and case number, a clear explanation of each objection, and a summary of the reason for each objection. **All objections must be filed no later than 30 days of the publication of this notice in the newspaper. Not filing objections during said term will preclude the class member from being heard by the First Instance Court that sees the case, and will be bound to the proposed agreement.**

15. The lawsuit against codefendant Asociación de Suscripción Conjunta del Seguro de Responsabilidad Obligatorio in the First Instance Court San Juan Part, is not part of this settlement, and the case will continue against said codefendant.

In San Juan, Puerto Rico, on \_\_\_\_ \_\_\_\_, 2016.

**EXHIBIT D**

**APPLICATION FOR REIMBURSEMENT OF THE DUPLICATE PREMIUMS FOR COMPULSORY INSURANCE**

**1. APPLICANT'S NAME AND LAST NAMES**

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**2. APPLICANT'S SOCIAL SECURITY NUMBER (9 DIGITS)\***

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**3. MAILING ADDRESS\***

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**4. E-MAIL ADDRESS**

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**5. THE UNDERSIGNING IS THE OWNER OF THE VEHICLE(S) DESCRIBED BELOW AND STATES UNDER PENALTY OF PERJURY THAT:**

- a. They are or were the owner of the vehicle(s) described below, paid a private insurance policy and the compulsory insurance policy to the Treasury Department for said vehicle(s).
- b. The undersigning has not been reimbursed, nor have they received a credit for the compulsory insurance policy that applies to the vehicle(s) described herein.
- c. The undersigning appears on the lists of vehicle owners who are entitled to a reimbursement, sent by the Asociación de Suscripción Conjunta del Seguro de Responsabilidad Obligatorio to the Treasury Department, corresponding to years 1998 to 2010.
- d. The undersigning requests a reimbursement for the compulsory insurance payment.

**6. INFORMATION RELATED TO THE VEHICLE(S) FOR WHICH REIMBURSEMENT IS BEING REQUESTED. (YOU MAY USE ADDITIONAL PAGES IF NECESSARY)**

Plate Number	Vehicle Identification Number (VIN)*	Insurance Carrier*	Policy Number*	Year Claimed*

**\*REQUIRED INFORMATION**

**DATE OF APPLICATION:** \_\_\_\_\_



**APPLICANT'S SIGNATURE:** \_\_\_\_\_

I, Lynmar Vera, B.A. in Foreign Languages and having approved Phase I of the Federal Court Interpreters Certification Examination do hereby certify that I have translated from Spanish to English the foregoing document consisting of 8 pages, not including this certification, and that it is a true and accurate translation to the best of my knowledge and ability.



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December 8, 2020

Lynmar Vera

B.A. in Foreign Languages